

EXHIBIT B

Siu, Sarah E.

From: Paul Werner <PWerner@sheppardmullin.com>
Sent: Tuesday, September 5, 2023 2:04 PM
To: Stein, Callan G.
Cc: Angelo Pavone; Dave Thomas; Imad Matini; Amanda Witt; Charles Spencer-Davis; Calla Simeone; Kathryn J. Ryan; Tom Reklaitis; Alexandra Bustamante; Maria-Laura Coltre; Hannah Wigger; Siu, Sarah E.; Lacy, Michael E.; Flynn, Virginia Bell; Liberman, Harry J.
Subject: RE: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

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Cal, following up, Anthem produced a document (ANTM-00018663) in which there is a detailed reference to the CEO's concern about provider payments related to AIS, which confirms her direct involvement in such matters.

In addition, we understand from our clients that the CEO was informed of and involved in the contract negotiations (as stated by Paige Henning) as well as patient complaints involving the agreement terminations (and also based on documents produced by Anthem, ANTM-00058024; ANTM-00058202).

These are all relevant to the issues in dispute, proper areas of deposition inquiry, and based on the CEO's specific, first-hand involvement and knowledge of facts and issues in dispute.

We are happy to discuss scheduling and other aspects of the deposition with you.

Warm regards,

Paul Werner

+1 202-747-1931 | direct

+1 703-740-6892 | cell

PWerner@sheppardmullin.com | [Bio](#)

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From: Paul Werner <PWerner@sheppardmullin.com>

Sent: Tuesday, September 5, 2023 11:34 AM

To: Stein, Callan G. <Callan.Stein@troutman.com>

Cc: Angelo Pavone <apavone@sheppardmullin.com>; Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>; Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis <CSpencerDavis@sheppardmullin.com>; Calla Simeone <csimeone@sheppardmullin.com>; Kathryn J. Ryan

<katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra Bustamante <abustamante@sheppardmullin.com>; Maria-Laura Coltre <MColtre@sheppardmullin.com>; Hannah Wigger <HWigger@sheppardmullin.com>; Siu, Sarah E. <Sarah.Siu@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell <Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

Subject: Re: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

No Cal, we will be responding further to explain what we are interested in. After that, happy to discuss.

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On Sep 5, 2023, at 11:32 AM, Stein, Callan G. <Callan.Stein@troutman.com> wrote:

Paul:

I do not think it productive to engage in this discussion over email, but I am compelled to disagree with your assertion that our deposition of Mr. Castellanos—who you know full well was directly involved in the matters at issue here, was on hundreds (if not thousands) of relevant emails that AIS has produced, and was identified by AIS as one of its corporate representatives—is somehow for the purpose of “harassing” Bond. You know as well as I do that is not the case.

Regardless, it appears you are refusing to articulate your supposed basis for deposing Ms. Boudreaux, despite my request that you do so. Nonetheless, we are happy to meet and confer on this issue. Michael and I are available to do so from 3:30-5 today. If that time does not work, please propose some other times that do work.

Thank you.

Callan G. Stein

Partner

troutman pepper

Direct: 617.204.5103

callan.stein@troutman.com

From: Paul Werner <PWerner@sheppardmullin.com>

Sent: Tuesday, September 5, 2023 11:20 AM

To: Stein, Callan G. <Callan.Stein@troutman.com>; Angelo Pavone <apavone@sheppardmullin.com>

Cc: Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>;

Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis

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Cal – We do not need to justify the timing of our notice. As surely you know, there is always a rush to gather relevant evidence as the end of discovery nears. There is also some real irony in your objection given you all are deposing AIS's CEO as well – are you doing that just to harass him and the company (I had thought not until this am's missive)?

Paul Werner

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From: Stein, Callan G. <Callan.Stein@troutman.com>

Sent: Tuesday, September 5, 2023 11:15 AM

To: Paul Werner <PWerner@sheppardmullin.com>; Angelo Pavone <apavone@sheppardmullin.com>

Cc: Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>;

Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis

<CSpencerDavis@sheppardmullin.com>; Calla Simeone <csimeone@sheppardmullin.com>; Kathryn J.

Ryan <katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra

Bustamante <abustamante@sheppardmullin.com>; Maria-Laura Coltre

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<Sarah.Siu@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell

<Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

Subject: RE: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

Paul:

I have requested that you to articulate your supposed basis for deposing Ms. Boudreaux. We are happy to meet and confer on this issue, but for that to be productive I would appreciate it if you would respond to my request first. For starters, please articulate the involvement you allege Ms. Boudreaux had in the facts and circumstances here such that you believe you are entitled to send a notice of her deposition at 11:15pm the Friday before Labor Day weekend, six working days before the close of discovery.

Thank you.

Callan G. Stein

Partner

troutman pepper

Direct: 617.204.5103

callan.stein@troutman.com

From: Paul Werner <PWerner@sheppardmullin.com>

Sent: Tuesday, September 5, 2023 11:06 AM

To: Stein, Callan G. <Callan.Stein@troutman.com>; Angelo Pavone <apavone@sheppardmullin.com>

Cc: Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>;

Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis

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Ryan <katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra

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Cal -- I will politely disregard your accusations, which are bogus (and unprofessional), for now and note your core assertion that Anthem's CEO had no involvement in the facts and circumstances here is demonstrably false. j She did, and we are entitled to depose her about it. We would be happy to meet and confer with you on that, but if we are going to do that, we need you to (a) get your facts straight and (b) drop the histrionics.

Warmest regards,

Paul Werner

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From: Stein, Callan G. <Callan.Stein@troutman.com>

Sent: Tuesday, September 5, 2023 11:01 AM

To: Angelo Pavone <apavone@sheppardmullin.com>; Paul Werner <PWerner@sheppardmullin.com>

Cc: Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>;

Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis <CSpencerDavis@sheppardmullin.com>; Calla Simeone <csimeone@sheppardmullin.com>; Kathryn J. Ryan <katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra Bustamante <abustamante@sheppardmullin.com>; Maria-Laura Coltre <MColtre@sheppardmullin.com>; Hannah Wigger <HWigger@sheppardmullin.com>; Siu, Sarah E. <Sarah.Siu@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell <Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

Subject: RE: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

Paul,

I am responding to Mr. Pavone's email below and its attachment. As you are well aware, Ms. Boudreaux is Anthem's CEO and she has had no involvement with the issues in this matter. AIS has already deposed Anthem's corporate representative and has deposed or will depose seven Anthem representatives (including Anthem's corporate representative) in their individual capacities. Based on the facts of this case, including what has been elicited thus far in discovery, it is clear that AIS has no reason or basis to depose Ms. Boudreaux, beyond harassment of Anthem. If AIS believes it has some valid basis for this deposition, please inform us of that basis immediately.

Beyond this lack of basis (and secondary to it), this request comes extremely late. Discovery closes in the E.D. Va. matter on September 12, and as you are well aware there are no dates available before the close of discovery to conduct this deposition. AIS's delinquency and choice to raise this deposition at the literal eleventh hour—Mr. Pavone's email was sent at 11:15pm, on the Friday before Labor Day weekend no less—is further evidence of its impropriety.

We will give AIS the opportunity to withdraw this deposition notice. Otherwise, we will seek court intervention and other appropriate remedies.

Callan G. Stein

Partner

troutman pepper

Direct: 617.204.5103

callan.stein@troutman.com

From: Angelo Pavone <apavone@sheppardmullin.com>

Sent: Friday, September 1, 2023 11:15 PM

To: Siu, Sarah E. <Sarah.Siu@troutman.com>; Stein, Callan G. <Callan.Stein@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell <Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

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Maria-Laura Coltre <MColtre@sheppardmullin.com>; Hannah Wigger <HWigger@sheppardmullin.com>

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Counsel,

Please find attached AIS's deposition notice to Gail Boudreaux. Please let us know available dates as soon as possible.

Best regards,

Angelo Pavone | Associate
+1 202-747-2332 | direct
apavone@sheppardmullin.com

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